

# Section 504

## Audit Findings

Board Workshop  
January 7, 2025



# Agenda

- Section 504 Overview
- Stetson & Associates Audit Findings
- SBISD Planned Actions and Next Steps



# Eligibility and Services

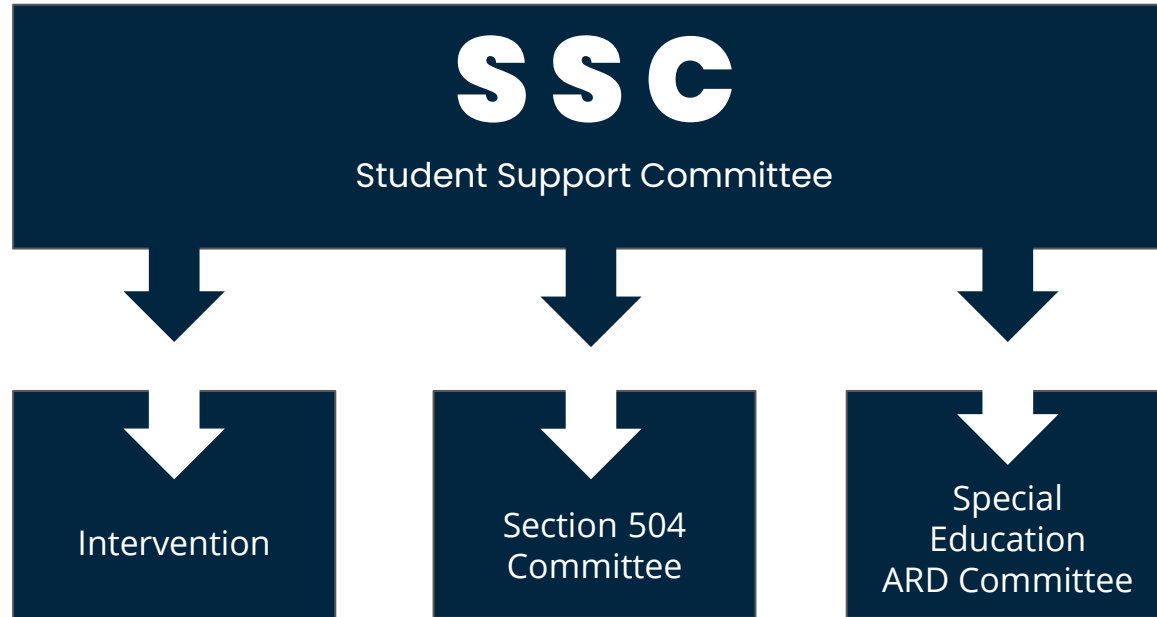
	Purpose	Eligibility	Services
Section 504	Protection of Civil Rights Provide equal access to education	Physical or mental impairment that substantially limits one or more major life activities	Protection Accommodations

## Most Common Section 504 Qualifying Disabilities

- Chronic health conditions
- ADD, ADHD
- Diabetes
- Severe food allergies
- Psychological conditions
- Epilepsy
- Traumatic Brain Injury
- Autism
- Dyslexia\*

\*Dyslexia is serviced only with accommodations through 504, any student needing specially designed instruction for dyslexia is served through Special Education.

# Referral Process



# Section 504 Enrollment

SBISD Campus Level	Fall 2023	Fall 2024
Pre-K Centers	1	2
Elementary Schools	544	502
Middle Schools	572	628
High Schools	996	1110
<b>Total</b>	<b>2,182 (6.5%)</b>	<b>2,245 (6.8%)</b>

# Section 504 Enrollment

## (2023-2024)

	Texas	Spring Branch ISD	Fort Bend ISD	Katy ISD
School District Total Enrollment	5,531,236	33,407	80,206	94,785
School District Total Section 504 Enrollment	400,078	2,182	3,573	4,407
% of Section 504 Services Students	7.2%	6.5%	4.4%	4.6%

# Stetson & Associates Audit

## Purpose of Audit

At the March 4, 2024 Regular Board meeting, an update for Special Education and Section 504 programming was provided. Following that meeting, SBISD contracted with Stetson & Associates to audit structures, processes, and communication strengths and weaknesses associated with SBISD's Section 504 Program.

## Structure of Audit

- Parent & staff surveys and focus groups
- Student folder reviews
- Review of district Section 504 data
- Review of SBISD Section 504 documents including the following:
  - SBISD Section 504 Handbook
  - Training materials
  - Process documents
  - Parent communications



# Stetson & Associates Audit

## Audit Report

The audit report provided commendations as well as recommendations in the following domains:

- Communications
- Staffing
- Accommodations
- Professional Development

# Stetson & Associates Audit

## Key Findings - Commendations

- A single district point of contact for Section 504 is improving processes on campuses
- Recently updated processes, checklists, and forms have improved Section 504 work across the system
- Teachers are better informed about Section 504 processes and accommodations compared to years past
- Folder reviews found that campuses are generally maintaining proper documentation on Section 504 students
- A review of the SBISD Handbook found the document to be accurate and well-organized
- District identification, evaluation, and meeting processes were found to be well-designed and in compliance with the law and best practice

# Key Findings: Communications

## Communications – Stetson & Associates Recommendations

- Provide the Section 504 Handbook, website, and FAQ document to parents and staff
- Improve clarity, transparency, and timeliness of communication
- Streamline Section 504 processes including referrals, meetings, documentation, and plan implementation
- Encourage middle and high school students to attend their 504 meeting
- Improve communication between sending and receiving campuses and families during transition years

# Key Findings: Communications

## Communications – SBISD Planned Action

- Update the Section 504 website by including the revised Handbook, FAQ documents for parents and staff, and SBISD contact information
- Offer a Section 504 Parent U event each year beginning in fall 2025
- Train and support campus Section 504 facilitators with scheduling, meeting planning, and follow-up communication strategies with an emphasis on customer service
- Review and refine evaluation processes to improve timeliness of Section 504 plan deployment
- Set expectations that campuses encourage middle and high school students to participate in their own 504 meetings
- Conduct a follow-up survey with parents in fall 2025 to measure improvements

# Key Findings: Staffing

## Staffing – Stetson & Associates Recommendations

- Ensure campus staff have clear expectations about how to prepare for their role in Section 504 meetings
- Provide staff dedicated to Section 504 processes to allow for the timely scheduling of meetings, meeting preparation, and meeting follow-up
- Support campuses in scheduling Section 504 students to minimize the number of students with accommodations served in any one classroom

# Key Findings: Staffing

## Staffing - SBISD Planned Action

- Develop training for teachers on preparing for and participating in Section 504 meetings
- Hire an additional central staff member to deploy to high volume campuses in support of timely Section 504 meetings and services
- Assist campuses with master schedule development and strategies to better balance Section 504 student schedules

# Key Findings: Accommodations

## Accommodations – Stetson & Associates Recommendations

- Expedite communication of accommodations to classroom teachers
- Ensure campuses are consistent with the implementation of accommodations
- Develop clear expectations about when and how accommodation plans can be changed
- Develop consistent expectations for the documentation of accommodations

# Key Findings: Accommodations

## Accommodations - SBISD Planned Action

- Create a cross-campus accommodations committee to develop a set of process recommendations for:
  - The distribution of accommodations
  - Clear standards and definitions for accommodations
  - Evaluation of data in consideration of adding and/or removing accommodations
- Train campus leaders on committee recommendations and implementation plan
- Inform parents of the option to apply for ACT and College Board accommodations through either school processes or independently



# Key Findings: Professional Development

## Professional Development – Stetson & Associates Recommendations

- Annual training for all staff on Section 504 identification, referral processes, accommodations, and documentation
- Provide training on serving students with specific disabilities
- Provide annual training for campus Section 504 facilitators on:
  - Digital documentation
  - Holding effective and collegial meetings with teachers and families
  - Section 504 legal updates
  - District processes related to Section 504 topics

# Key Findings: Professional Development

## Professional Development - SBISD Planned Action

- Provide annual training for all staff on Section 504 identification, referral processes, accommodations, and documentation
- Provide training opportunities for teachers on serving students with specific disabilities
- Provide annual training for campus leaders on Section 504 legal updates and district expectations
- Provide ongoing training for campus Section 504 facilitators no less than quarterly

# Stetson & Associates Audit

## SBISD Desired Outcomes

- Improved communication and engagement with families
- Improved timeliness and consistency in the implementation of accommodations
- Improved support for our campus staff in the management of Section 504 documentation and implementation of accommodations
- Better support for our Section 504 students in accessing the curriculum and improving academic performance



# Discussion